

NWA Comments to the RNAV NRPM
Docket No. FAA-2002-14002, Notice 02-20
January 31, 2003

Northwest Airlines would like to submit the following comments to the docket

1. General

Northwest Airlines requests a 60-day extension to the comment period to allow more time to better evaluate the impact of this proposed rule. This request is made due to the timing of the NRPM coming over the holiday period.

2. FAR 121.99

Northwest Airlines is concerned over the proposal to add a definition of “rapid communications” based on a legal interpretation as opposed to operational considerations and experience. The legal interpretation does not consider the realities of international aircraft-to-dispatch communications. The concern over this change is the ability to meet the 4-minute requirement while operating in remote/oceanic regions where the primary communication medium is HF Voice.

The process used to exchange communication is complex and requires that initial contact be made through a communication service provider (ARINC) who will then establish a voice connection between the aircraft and dispatch. This is a time consuming process. Additionally, the propagation characteristics of HF radio may also prevent the link from being established within the 4-minute time frame. This is out of the control of the operator and therefore we cannot be held responsible for meeting this criterion so we believe that this change is an unreasonable and unachievable objective.

3. FAR 121.103

Northwest Airlines is not opposed to the intent of the proposed changes but it appears that all that was done was to change the title of the rule and the body remains focused on establishing requirements for navigation aids, not systems.

4. FAR 121.121

Northwest Airlines is not opposed to the intent of the proposed changes but it appears that all that was done was to change the title of the rule and the body remains focused on establishing requirements for navigation aids, not systems.

5. FAR 121.349

Northwest Airlines supports the FAA’s efforts to make this rule performance based. We believe it will allow the current navigation infrastructure to evolve into a satellite-based system. And given the direction that the FAA is taking toward an RNP-based infrastructure, making the system performance based will allow the operators to utilize both existing navigation aids and any future

satellite-based systems as sensors to navigate using the concept of Required Navigation Performance.

We do however believe that the rule as currently written does not provide adequate clarification of what combinations of navigation sensors and/or equipment will satisfy the requirements of the rule and would prefer to see some prescriptive examples in the preamble.

6. FAR 121.344

Northwest Airlines supports the FAA's action to create a distinction between Decision Height and Decision Altitude. What is not clear in this rule is what changes, if any will be required to sub paragraph (a)(54) of the rule. If we are required to record only the setting and not a discrete that indicates if it is DH or DA, then we support the change. We would however be opposed if this rule change requires that a discrete be added to the parameters differentiating between DH and DA.